09-50026-mg Doc 14468-2 Filed 03/08/19 Entered 03/08/19 17:10:18 Exhibit B - Proposed Order Pq 1 of 2

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

ORDER AUTHORIZING FILING UNDER SEAL CERTAIN DOCUMENTS IN SUPPORT OF THE ECONOMIC LOSS PLAINTIFFS' REPLY IN SUPPORT OF RULE 23(E) MOTION

Upon consideration of the Motion¹ filed by the Economic Loss Plaintiffs pursuant to Bankruptcy Code Section 107(b), Bankruptcy Rule 9018, and Local Rule 9018-1 for an order authorizing filing under seal certain Subject Materials with their Reply in Support of their Rule 23(e) Motion; the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334; venue being proper before this Court pursuant to Sections 28 U.S.C. §§ 1408 and 1409; it appearing that proper and adequate notice of the Motion has been given; the Court having reviewed the Motion and having determined that the legal and factual basis set forth in the Motion establishes just cause for the relief granted herein; and upon due deliberation and sufficient cause appearing therefore; it is hereby

ORDERED that the Motion is granted pursuant to Bankruptcy Code Section 107(b), Bankruptcy Rule 9018, and Local Rule 9018-1; and it is further

ORDERED that Economic Loss Plaintiffs are authorized to file the Subject Materials under seal in this matter; and it is further

Capitalized terms not otherwise defined herein shall have the meanings given to them in the attached *Motion For Authorization To File Under Seal Certain Documents In Support Of The Economic Loss Plaintiffs' Reply In Support of Rule 23(e) Motion* (the "Motion").

Entered 03/08/19 17:10:18 Exhibit B -09-50026-mg Doc 14468-2 Filed 03/08/19 Proposed Order Pg 2 of 2

ORDERED that counsel to the GUC Trust and New GM shall have access to unredacted

copies of the Subject Materials and shall treat such Subject Materials as confidential in

accordance with the terms of the MDL Protective Order; and it is further

ORDERED that the Subject Materials shall remain confidential and under seal pending

further order of this Court; and it is further;

ORDERED that in the event the Subject Materials have not been unsealed by further

order of this Court, Economic Loss Plaintiffs will retrieve the Subject Materials at the conclusion

of proceedings relating to the proposed Settlement (as defined in the Reply); and it is further

ORDERED that this Order is without prejudice to the rights of any party in interest, or

the United States Trustee, to seek to unseal the documents, or any part thereof.

Dated: ______, 2019

New York, New York

THE HONORABLE MARTIN GLENN

UNITED STATES BANKRUPTCY JUDGE

2